

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

CHRISTINE CONFORTI,

Plaintiff,

v.

CHRISTINE GIORDANO HANLON, in
her official capacity as Monmouth County
Clerk, SCOTT M. COLABELLA, in his
official capacity as Ocean County Clerk,
and PAULA SOLLAMI COVELLO, in her
official capacity as Mercer County Clerk,

Defendants.

Case No. 3:20-cv-08267-FLW-TJB

Civil Action

**NOTICE OF MOTION TO
DISMISS PURSUANT TO
FED. R. CIV. P. 12(b)(6)**

TO: Brett M. Pugach, Esq.
Bromberg Law, LLC
43 West 43rd Street, Suite 32
New York, New York 10036
Attorney for Plaintiff

COUNSEL:

PLEASE TAKE NOTICE that on **January 4, 2021**, at 9:00 a.m., or as soon thereafter as counsel may be heard, the undersigned, counsel for defendant, Paula Sollami-Covello will move before the Honorable Freda L. Wolfson, U.S.D.J., at the U.S. District Court for the District of New Jersey, 402 East State Street Room 2020, Trenton, NJ 08608, for an Order dismissing plaintiff, Christine Conforti's Complaint pursuant to Fed. R. Civ. Proc. 12(b)(6).

PLEASE TAKE FURTHER NOTICE that the undersigned shall rely upon the accompanying Brief in Support of Defendant's Motion to Dismiss pursuant to Fed. R. Civ. P. 12(b)(6).

PLEASE TAKE FURTHER NOTICE that a Proposed Form of Order is submitted herewith.

GENOVA BURNS LLC

*Attorneys for Defendant,
Paula Sollami-Covello*

By: /s/ Angelo J. Genova
Angelo J. Genova, Esq.
Jennifer Borek, Esq.
Christopher Zamlout, Esq.
GENOVA BURNS LLC
494 Broad Street
Newark, New Jersey 07102
973-533-0777
973-533-1112 (fax)
agenova@genovaburns.com
jborek@genovaburns.com
czamlout@genovaburns.com

Dated: December 7, 2020

CERTIFICATE OF SERVICE

I, Jennifer Borek, certify that a copy of (1) Defendant's Notice of Motion to Dismiss; (2) Defendant's Brief in Support of its Motion; and (3) a Proposed Order was filed on the Court's CM/ECF system on December 7, 2020, which caused a copy of the foregoing to be served on counsel of record for all parties:

Brett M. Pugach, Esq.
Bromberg Law, LLC
43 West 43rd Street, Suite 32
New York, New York 10036
Attorney for Plaintiff

Erik Anderson, Esq.
Reardon Anderson LLC
55 Gilbert Street North
Suite 2204
Tinton Falls, New Jersey 07701
Attorney for Defendant Christine Giordano Hanlon

Christopher Ali Khatami, Esq.
John C. Sahradek, Esq.
Berry Sahradek Kotzas & Benson
212 HOOPER AVENUE
P.O. Box 757
Toms River, New Jersey 08754
Attorneys for Defendant Mark M. Colabella

Jaime Richard Placek, Esq.
Rafael Jaume Corbalan, Esq.
Kaufman Semeraro & Liebman, LLP
Two Executive Drive
Suite 530
Fort Lee, New Jersey 07024
Attorneys for Intervenor, Bergen County Clerk

Dated: December 7, 2020

/s/ Jennifer Borek
Jennifer Borek, Esq.

#15698419v1 (1815.180)